

MAHER & PITTELL, LLP
ATTORNEYS AT LAW

Reply To:

42-40 Bell Blvd, Suite 302
Bayside, New York 11361
Tel (516) 829-2299
jp@jpittell.com

Long Island Office
14 Bond St, Suite 389
Great Neck, New York 11021
Tel (516) 829-2299
jp@jpittell.com

January 27, 2021

Hon. Laura Taylor Swain
U.S. District Judge
Southern District of New York
500 Pearl St.
New York, NY 10007

MEMO ENDORSED

Re: *US v. Constantinescu, et. al {Alexandru Radulescu}*, 19 cr 651 (LTS)

Dear Judge Swain:

I am counsel for Alexandru Radulescu, a defendant in the above referenced matter.

Currently, Mr. Radulescu's case is scheduled for a status conference on February 10, 2021. Please accept this letter in lieu of a formal motion requesting an adjournment of the conference. I make this request as I have been engaged in plea discussions with the Government and I seek additional time to continue these discussions as well as review discovery which has been produced on a rolling basis.

Accordingly, I respectfully request the conference be adjourned to a date in late March or early April.

I have conferred with the Government and they consent to the request.

I consent to an exclusion of time applicable to the Speedy Trial Act from February 10, 2021 until the adjourn date.

Respectfully submitted,
/s/
Jeffrey G. Pittell

cc: all parties (ECF)

The application is granted. The conference is adjourned to March 26, 2021, at 9:00 a.m. The Court finds pursuant to 18 U.S.C. §3161(h)(7)(A) that the ends of justice served by an exclusion of the time from today's date through March 26, 2021, outweigh the best interests of the public and the defendant(s) in a speedy trial for the reasons stated above.

SO ORDERED.

Dated: 1/28/2021

/s/ Laura Taylor Swain

Laura Taylor Swain, USDJ